

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**JACQUELINE ONOFRE, INDIVIDUALLY  
AND A/N/F OF LUKE ONOFRE and  
HANNAH ONOFRE, MINORS**

**V.**

**C.R. ENGLAND, INC. and  
PAUL JOHNSON**

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**CIVIL ACTION NO. NO: 15-CV-00425-DAE**

**DEFENDANTS' FIRST SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

C.R. ENGLAND, INC. and PAUL JOHNSON, Defendants in the above-styled and numbered cause, hereby designate the following expert witnesses in accordance with this Honorable Court's Scheduling Order and Rule 29 stipulations among the parties:

**RETAINED EXPERT WITNESSES**

- (1) Richard V. Baratta, Ph.D.  
Rimkus Consulting Group, Inc.  
Eight Greenway Plaza, Suite 500  
Houston, Texas 77046  
(713) 621-3550

Dr. Baratta holds a Ph.D. in biomedical engineering and will provide opinions regarding biomechanics, mechanism of injury, occupant kinematics, impact analysis, and accident reconstruction, among other things. Dr. Baratta's expert report, Curriculum Vitae, testimony listing, and fee schedule were previously provided with Defendants' original expert designation. Dr. Baratta's complete file, including his notes, memoranda, diagrams, photographs, radiology films and further exhibits which he expects to use at the trial of this case, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Baratta is presented for deposition.

- (2) John R. Anderson, M. D.  
511 Kreutzberg Road  
Boerne, Texas 78006  
(830) 446-9733

Dr. Anderson is Defendants' orthopedic surgeon expert and will provide opinions regarding Plaintiff Jacqueline Onofre's alleged injuries, the diagnoses and

treatment provided to Plaintiff Jacqueline Onofre, and the prognosis for Plaintiff Jacqueline Onofre's recovery from her alleged injuries, among other things Dr. Anderson's expert report, Curriculum Vitae, testimony listing, and fee schedule were previously provided with Defendants' original expert designation. Dr. Anderson's complete file, including notes, memoranda, medical records, photographs, radiology films and literature in support of his opinions, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Anderson is presented for deposition.

- (3) **Dr. Irmo Marini, Ph.D., D.Sc., CRC, CLCP, FVE®**  
**2609 Brazos Avenue**  
**McAllen, Texas 78504**  
**(956) 380-6499**

**Dr. Marini is Defendants' vocational rehabilitation expert and will provide opinions regarding Plaintiff Jacqueline Onofre's educational background and training, her ability to be employed, employment positions available to her in the market, her qualifications and skill set for employment, among other vocational issues. See Dr. Marini's expert report (Exhibit "H"), Curriculum Vitae (Exhibit "I"), testimony listing (Exhibit "J") and fee schedule (Exhibit "K"). Dr. Marini is expected to base his opinions on his training, education, experience, and qualifications. He may also rely on tests, experiments, research studies, or reports he has performed/prepared or with which he is familiar, in addition to the materials reviewed as part of Dr. Marini's file in this case. Dr. Marini's complete file, including notes, memoranda, medical records, photographs, radiology films and literature in support of his opinions, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Marini is presented for deposition.**

**NON-RETAINED EXPERT WITNESSES**

- (4) Deputy R. Gill, ID No. 2943  
Bexar County Sheriff's Department  
200 North Comal Street  
San Antonio, Texas 78207  
(210) 335-6300  
Deputy Gill investigated the accident in question. See copy of Deputy Gill's accident investigation report previously produced as CRE-0001 through CRE-0004.
- (5) Plaintiffs' Medical Providers, as follows –  
  
Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Christus Santa Rosa – Westover Hills

11212 Texas Highway 151  
San Antonio, Texas 78251  
(210) 703-8000

Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Family Clinics of San Antonio  
11730 West Avenue  
San Antonio, Texas 78216  
(210) 340-8501

Hugo Alonzo Rojas, M. D.  
And the Custodian of Records for  
Family Clinics of San Antonio  
2115 Pleasanton Road, Suite 205  
San Antonio, Texas 78221  
(210) 922-3627

Michael Murphy, M. D.  
And the Custodian of Records for  
Consultants in Pain Medicine  
423 Treeline Park  
San Antonio, Texas 78209  
(210) 546-1455

Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Medical Center Ophthalmology Associates  
9157 Huebner Road  
San Antonio, Texas 78240  
(210) 267-2020

Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
River City Chiropractic – Ingram  
6338 N.W. Loop 410  
San Antonio, Texas 78238  
(210) 682-9696

Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Premier Medical Imaging  
11730 West Avenue  
San Antonio, Texas 78216  
(210) 922-0016

Michael Leonard, M. D.  
And the Custodian of Records for  
Alamo Neurosurgical Institute  
414 West Sunset Road, Suite 205  
San Antonio, Texas 78209  
(210) 564-8300

Cesar Gerez-Martinez, M. D.  
And the Custodian of Records for  
MedFirst Westover Hills Primary Care Clinic  
3903 Wiseman Boulevard, Suite 100  
San Antonio, Texas 78251  
(210) 681-0126

Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
San Antonio Military Medical Center  
78234, 3551 Roger Brooke Drive  
San Antonio, Texas 78219  
(210) 916-4342

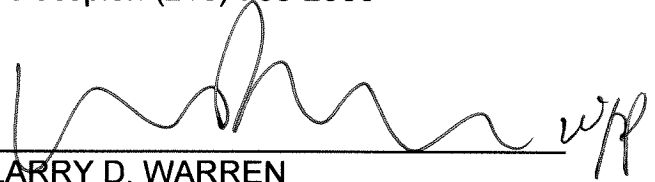
Doctors, Nurses, Technicians, Other Medical Providers  
And the Custodian of Records for  
Bennett Health Clinic  
761st Tank Battalion Avenue  
Fort Hood, Texas 76544  
(254) 618-8039

Ricardo A. Riojas, M. D.  
And the Custodian of Records for  
San Antonio Pediatric Associates, P.A.  
9793 Culebra Road, Suite 105  
San Antonio, Texas 78251  
(210) 681-6439

Defendants further reserve the right to call to testify, cross examine, and/or elicit testimony from all persons and experts (whether retained or non-retained) identified by Plaintiff or any other party, and to call to testify, cross examine, and/or elicit testimony from any responsible third party in this lawsuit. Defendants do not adopt the opinions and/or conclusions of the persons and experts not retained by Defendant but who have been identified by Defendants, Plaintiffs, or any other party. Furthermore, Defendants cannot vouch for the knowledge, skill, experience, training, education, or credibility of the persons not retained by Defendants but identified as non-retained experts or identified as retained or non-retained experts by Plaintiff or any other party, nor do Defendants agree that such persons qualify as experts regarding the matters on which they seek to testify.

Respectfully submitted,

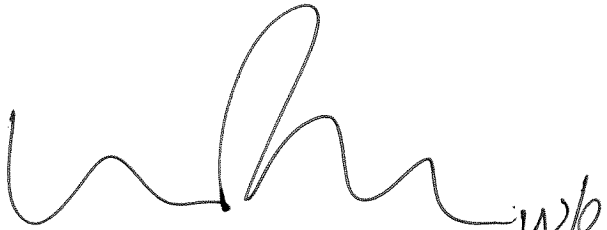
NAMAN HOWELL SMITH & LEE, PLLC  
10001 Reunion Place, Suite 600  
San Antonio, Texas 78216  
Telephone: (210) 731-6350  
Telecopier: (210) 785-2950

  
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LARRY D. WARREN  
State Bar No. 20888450  
ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been sent on the 26<sup>th</sup> day of January, 2016, to the following:

**F-Filing Notification**  
**rwilson@thomasjhenrylaw.com**  
Mr. Thomas J. Henry  
Mr. Robert P. Wilson  
THE LAW OFFICE OF THOMAS J. HENRY  
512 Starr Street  
Corpus Christi, Texas 78401  
**ATTORNEYS FOR PLAINTIFFS**

  
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LARRY D. WARREN